

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

:

**IN RE: Angela Girondo** : **Case No. 15-13241**

: **Chapter 13**

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**OBJECTION TO THE ENTRY OF DEFAULT**

Debtor, by and through her attorney, Diane E. Barr, Esquire, hereby objects to the entry of default in favor of Wilmington Trust National Association based on the foregoing:

1. Debtor complied with the terms as set forth in the stipulation by submitting the loan modification prior to the specified deadline.
2. Movant never responded to the application and refused to speak to Debtor because the loan is not currently in Debtor's name. Debtor is the heir to her deceased brother's property.
3. Debtor's efforts to resolve the mortgage delinquency were frustrated by Movant's refusal to communicate with Debtor.

Wherefore, Debtor requests that this Honorable Court permit Debtor to pursue a possible loan modification.

Date: June 11, 2018

/s Diane E. Barr, Esquire

Diane E. Barr, Esquire